

# EXHIBIT B

FILED FOR RECORD  
9/17/2019 8:55 AM  
MARY MARGARET WRIGHT  
COUNTY CLERK  
HENDERSON COUNTY, TEXAS  
Selena Rodriguez

Cause No. 00344-CCL-19

PATSY GRAY	§	IN THE COUNTY COURT
Plaintiff	§	
	§	
v.	§	AT LAW _____
	§	
RELIASTAR LIFE INSURANCE COMPANY	§	
Defendant	§	HENDERSON COUNTY, TEXAS

### PLAINTIFF'S ORIGINAL PETITION

Comes now PATSY GRAY and makes this Plaintiff's Original Petition and would respectfully show the court as follows:

Plaintiff is an individual residing in Henderson County, Texas. The last three digits of Plaintiff's driver's license is 875 and the last three digits of her social security number is 637.

Defendant RELIASTAR LIFE INSURANCE COMPANY (hereinafter RELIASTAR) is an insurance company licensed to do business in and doing business in Texas that may be served with process by serving its registered agent C. T. Corporation System by certified mail at 1999 Bryan St #900, Dallas Texas 75201.

Venue is proper in Henderson County Texas because all or part of the occurrence complained of herein occurred in Henderson County.

Plaintiff is the beneficiary on a RELIASTAR Policy insuring the life of EDGAR BRUCE GRAY (POLICY NO. CBS0121788; CLAIM NO. C-2019-582191). EDGAR BRUCE GRAY is deceased, and Plaintiff has complied with all conditions precedent for payment of the insurance policy proceeds. Although entitled to payment under the terms of the insurance contract and demand having been made, Defendant RELIASTAR has failed and refused to pay the policy proceeds due Plaintiff of \$90,000 for which Plaintiff now sues.

In addition, Plaintiff has been required to secure the services of counsel to present this claim and has incurred reasonable and necessary attorney fees as a result, for which the law allows recovery from Defendant. Accordingly, Plaintiff requests reasonable and necessary attorney fees in an amount not less than \$2,500.00 be awarded Plaintiff from Defendant RELIASTAR.

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff prays for damages of \$90,000.00 together with reasonable and necessary attorney fees, pre and post judgment interest; costs of court and such other and further relief to which Plaintiff may show herself justly entitled.

Respectfully submitted,

/s/ James H. Owen

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